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February 29, 2008

Via Electronic Comment Filing System

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W., Suite TW-A325
Washington, D.C. 20554

FILED/ACCEPTED

FEB 29 2008

Federal Communications Commission
Office of the Secretary

**Re: Annual Compliance Certification of Level 3 Communications,
LLC and its Affiliates Pursuant to 47 C.F.R. § 64.2009(e)**

Dear Ms. Dortch:

Enclosed please find the above-referenced certification for filing with the Federal Communications Commission. If you have any questions regarding the attached, please contact me at the number provided above.

Sincerely yours,



Michael R. Romano

Enclosure

Boston
Hartford
Hong Kong
London
Los Angeles
New York
Orange County
San Francisco
Santa Monica
Silicon Valley
Tokyo
Walnut Creek
Washington

cc: Enforcement Bureau Telecommunications Consumers Division (2 copies)
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Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2007

Date filed: February 29, 2008

Name of companies covered by this certification:

Level 3 Communications, LLC
Broadwing Communications, LLC'
ICG Telecom Group, Inc.
Looking Glass Networks, Inc.
Looking Glass Networks of Virginia, Inc.
Progress Telecom, LLC
TelCove of Pennsylvania, LLC
TelCove of Virginia, LLC
TelCove Operations, LLC
Vyvx, LLC
Wiltel Communications, LLC

Form 499 Filer ID:

Level 3 Communications, LLC: 818086
Broadwing Communications, LLC is filer ID 822866.
ICG Telecom Group, Inc: 808692
Looking Glass Networks, Inc: 820045
Looking Glass Networks of Virginia, Inc: 821970
Progress Telecom, LLC: 822572
TelCove of Pennsylvania, LLC - 811223
TelCove of Virginia, LLC - 818746
TelCove Operations, LLC - 820155
Vyvx, LLC: 824554
Wiltel Communications, LLC: 805503

Name of signatory: John M. Ryan

Title of signatory: Assistant Chief Legal Officer

I, John M. Ryan, certify that I am an officer of the companies named above, and acting as an agent of the companies, that I have personal knowledge that the companies have established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*


Attached to this certification is an accompanying statement explaining how the

companies' procedures ensure that each company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The companies have not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI , and what steps companies are taking to protect CPNI.

The companies have not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed


John M. Ryan

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**STATEMENT OF LEVEL 3 COMMUNICATIONS, LLC AND ITS AFFILIATES
REGARDING COMPLIANCE WITH FEDERAL REQUIREMENTS
GOVERNING USE AND PROTECTION OF
CUSTOMER PROPRIETARY NETWORK INFORMATION ("CPNI")**

Level 3 Communications, LLC (together with its affiliates as listed on page 1 of this certification, "Level 3") operates one of the largest communications backbones in the United States and provides a wide variety of voice and data services to wholesale customers and global, national, and regional enterprises. Level 3 has implemented a number of operating processes and procedures to protect sensitive customer information and to help ensure that CPNI is used and maintained consistent with the rules of the Federal Communications Commission (the "Commission").

All employees of Level 3 are required as a general matter to maintain the confidentiality of all information they obtain in connection with their employment, including customer-related information. Moreover, in November 2007, Level 3 implemented a new CPNI protection policy to reflect modifications to the Commission's CPNI rules as adopted in April 2007. The policy was delivered to all employees of Level 3, and explains, among other things what constitutes CPNI, what requirements apply to use and/or disclosure of CPNI, what type of authentication is required to validate inbound requests for CPNI, and what kinds of record-keeping and reporting obligations apply to CPNI. The policy is also provided to new hires as part of their orientation materials. Level 3's policy expressly specifies that those employees who fail to abide by the policy are subject to disciplinary action. In addition, Level 3 has engaged in targeted training exercises and discussion sessions with those business units within the company that have access to CPNI for various business purposes to communicate the proper use and maintenance of CPNI. Finally, Level 3 has prepared and posted a video training program on its intranet for training of new hires and viewing by employees who have questions regarding CPNI-related matters, and has established and communicated to employees dedicated contact information for questions regarding such matters.

Consistent with the Commission's rules, Level 3 uses, discloses, and permits access to CPNI without customer approval for the purposes of: (1) billing and collecting for services rendered; (2) protecting the rights and property of Level 3, other users, and other carriers from unlawful use; (3) providing inside wiring, installation, maintenance, and repair services; and (4) providing or marketing services that are within the same class of services to which the customer already subscribes.

Level 3 has adopted a policy to transmit regular notices to all customers regarding their right to restrict use of, disclosure of, and access to CPNI. The notice informs customers of what types of information would be considered CPNI and identifies each customer's right, and Level 3's obligation, to protect the confidentiality of CPNI. In the notice, Level 3 states its intent to use CPNI to make customers aware of additional product offerings and also to share information regarding purchases of communications-related services internally for purposes of informing the customer of similar service offerings by corporate affiliates. The notice specifies the means by which a customer can choose to "opt out" of such use of its CPNI, explains that the customer may choose to do so at any time after receipt of the notice, and indicates that any approval or denial of approval for use of CPNI would be valid for up to two years or until the customer affirmatively revoked or limited such approval or denial. Any customer response to these notices is directed to the Level 3 legal department, which maintains such notices for a minimum

of two years.

Level 3 has implemented a system by which the status of a customer's CPNI approval can be clearly established prior to the use or disclosure of that customer's CPNI. Specifically, Level 3 maintains a database for tracking CPNI restricted accounts. Unless a one-time approval for use of CPNI is obtained consistent with the Commission's rules, Level 3 representatives who market using CPNI review this database and refrain from marketing to customers with a CPNI restricted account.

At this time, Level 3 does not share, sell, lease, or otherwise provide any CPNI with or to any unaffiliated third parties for marketing purposes, and it will not do so in the future absent affirmative consent from the affected customer(s). Any outbound requests for approval from customers with respect to use of CPNI in such marketing campaigns are to be reviewed in advance by the Level 3 legal department and appropriate supervisory personnel. Level 3 maintains records relating to such marketing campaigns that use CPNI for at least one year.

Level 3 has taken reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI. Only certain organizations within the company are authorized to discuss or provide CPNI to a customer in the context of providing services to that customer (e.g., to take an order, resolve a billing question, or resolve a service trouble report). In turn, those organizations that are authorized to discuss CPNI with or provide CPNI to a customer are required to engage in proper authentication of inbound requests for communication of CPNI. With respect to customer requests regarding call detail information, all employees have been instructed to refer such requests to a specific organization within Level 3 that has been trained not to provide such information to inbound callers over the phone, and instead transmits such information in a manner consistent with the Commission's rules (i.e., by either sending information to the account postal or e-mail address of record or calling the customer back at the telephone number of record). For all other inbound customer requests regarding (non-call detail) CPNI, Level 3 requires reasonable authentication in each case by reference to specific detailed information about the account or the particular services at issue. In addition, with respect to any online access that customers may have to CPNI, Level 3 employs password protection measures (and backup/reset processes) that do not rely upon readily available biographical information or account information. Finally, where any changes are requested or created by a customer with respect to account information such as address of record or online password access, Level 3 sends notification of such changes to the prior contact of record.

Through its policy and the training exercises, Level 3 has communicated to its employees the importance of providing prompt notification of any breaches with respect to the security of CPNI and the time frames for such required by the Commission's rules. Specifically, Level 3 has provided all employees with contact information to help ensure that appropriate business units and legal representatives of Level 3 receive rapid notification of any potential breaches. In turn, such business units and legal representatives have been informed of their reporting and record-keeping obligations under the Commission's CPNI rules with respect to any breaches thereof, including reporting such occurrences to law enforcement and later to customers if law enforcement approves. Level 3 will also maintain records relating to such breaches for a minimum of two years.